

1 HONORABLE JUDGE ROBERT J. BRYAN
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8 **IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT TACOMA**

11 C. P., by and through his parents,
12 Patricia Pritchard and Nolle Pritchard;
13 and PATRICIA PRITCHARD,

14 Plaintiff,

15 vs.

16 BLUE CROSS BLUE SHIELD OF
17 ILLINOIS,

18 Defendants.

19 Case No. 3:20-cv-06145-RJB

20 **DECLARATION OF SUZANNE LIVORSI
21 IN SUPPORT OF BLUE CROSS BLUE
22 SHIELD OF ILLINOIS'S OPPOSITION TO
23 PLAINTIFFS' MOTION FOR LEAVE TO
24 FILE SECOND AMENDED COMPLAINT
25 AND TO ADD PARTIES AS ADDITIONAL
26 CLASS REPRESENTATIVES**

27 **NOTE ON MOTION CALENDAR:
OCTOBER 6, 2023**

17 Pursuant to 28 U.S.C. § 1746, I, Suzanne Livorsi, hereby declare as follows:

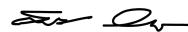
18 1. I am an employee of Health Care Service Corporation, a Mutual Legal Reserve
19 Company, which does business as Blue Cross Blue Shield of Illinois ("BCBSIL"). I have worked
20 as a Sr. Project Coordinator at BCBSIL for 6 years. I have personal knowledge or knowledge based
21 on records and information available to me of the facts contained in this affidavit and, if called to
22 testify in this matter, I could competently testify to each of the facts set forth herein.

23 2. Based on BCBSIL's review of the claims data for Emmett Jones, BCBSIL does not
24 have any record of any denial for treatment or procedure based on a gender-affirming care
25 exclusion.

1 3. Mr. Jones does not have any appeals pertaining to denials for medical necessity or
2 plan exclusions and Mr. Jones does not have any prior authorization requests or denials of prior
3 authorization requests.

4 4. I declare, under penalty of perjury under the laws of the United States of America,
5 that the foregoing is true and correct.

6 DATED this 6th day of October 2023, at Aurora, Illinois.

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Suzanne Livorsi

CERTIFICATE OF SERVICE

I certify that on the date indicated below I electronically filed the foregoing, DECLARATION OF SUZANNE LIVORSI IN SUPPORT OF BLUE CROSS BLUE SHIELD OF ILLINOIS'S OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT AND TO ADD PARTIES AS ADDITIONAL CLASS REPRESENTATIVES with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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DATED this October 10, 2023.

Kilpatrick, Townsend & Stockton LLP

By: */s/ Gwendolyn C. Payton*

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Counsel for Defendant Health Care Service Corporation, a Mutual Legal Reserve Company, doing business in Illinois as Blue Cross and Blue Shield of Illinois